

DPSCM 4155.35

FOREWORD

(Supplementation is prohibited)

This Manual provides guidance in the administration of Subsistence test evaluation actions.

This Manual will be maintained in a current status and reviewed biennially.

Users of this publication are encouraged to submit recommended changes and comments to improve the publication, through channels, to Directorate of Subsistence, ATTN: DPSC-HQP (P).

BY ORDER OF THE COMMANDER

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TABLE OF CONTENTS

PART I – TEST EVALUATION

<u>PARAGRAPH</u>		<u>PAGE</u>
I.	References	I-1
II.	Purpose and Scope	I-1
III.	Policy	I-1
IV.	Definitions	I-2
V.	Responsibilities	I-2
VI.	Procedures	I-3

PART II – ILLUSTRATIONS

Exhibit I	II-2
Exhibit II	II-4
Exhibit III	II-5
Exhibit IV	II-6

PART I – TEST EVALUATION

- I. REFERENCES.
- A. DLAM 4155.2, Quality Assurance Program Manual for Defense Supply Centers.
 - B. DPSCM 4155.6, Subsistence Inspection Manual.
 - C. DPSC Master Solicitations for Subsistence.
 - D. DPSC Clause 52.246-9P09, General Inspection Requirements.
 - E. DPSC Clause 52.246-9P10, Alternative Inspection Requirements for Selected Items.
 - F. DPSC Clause 52.246-9P020, Certificate of Conformance.
- II. PURPOSE AND SCOPE. To assign responsibilities, establish policy, and prescribe procedures for evaluating contractor's test systems/Certificate of Conformance (CoC) reliability and processing test reliability actions ensuing therefrom. This Manual is applicable to:
- A. The Quality Assurance Division (DPSC-HQ).
 - B. The Contracting and Production Division (DPSC-HP).
 - C. Defense Subsistence Region-Pacific (DSRP).
 - D. Defense Contract Management Area of Operation (DCMAO).
 - E. Government Quality Assurance Representatives (QAR).
 - F. Government laboratories.
- III. POLICY.
- A. Contractor's test systems are under constant review to assure both a reliable test system and a product which conforms to all requirements of the contract. Verification testing may be performed at any rate up to and including every lot on every contract. Contract documents shall be used to determine when added costs for Government testing are assessable. The test evaluation procedures shall not apply to production test contracts.
 - B. Contractors shall be notified of changes to the status of their test systems or Certificates of Conformance (CoC) by the contracting officer, or, when the contract is administered by DCMAO by the Administrative Contracting Officer (ACO). All requests for these changes related to DPSC (13H) contracts shall be coordinated with the contracting officer involved before being forwarded to ACO for action. When DSR contracts are involved, the request shall be coordinated with the DSR by telephone and shall be confirmed by letter.
 - C. The test data generated from the test evaluation program shall be incorporated into the contractor and item quality history files. This data shall be used by Quality Assurance Specialists in performing tasks in accordance with DLAM 4155.2 related to vendor performance, quality assurance procedures reviews, evaluation of waiver and deviation requests, and assessing equitable price adjustments for nonconforming supplies.
- IV. DEFINITIONS. For purpose of this Manual, the following apply:
- A. CONTROL OFFICE. The appropriate Commodity Branch, DPSC-HP, that is responsible for coordinating with DSR Pacific Contracting Office for all initial and subsequent reliability actions initiated by the Quality Assurance Storage Support/Quality Audit Branch, Quality Assurance Division (DPSC-HQS).
 - B. VERIFICATION TEST PROGRAMS. See references I.B., I.E., and I.F. for definitions, frequencies of sampling, and other criteria pertaining to verification testing.
 - C. COLLABRATIVE TEST STUDY. A technical sampling and testing study based on the use of statistical analysis to aid in resolving persistent problems in conformity and comparability of test results which incorporates the combined efforts of Government and contractors' facilities and personnel.
 - D. COMPARABILITY. A determination that the contractor's test results and the Government verification results do not differ by a statistically significant difference.
 - E. NONCOMPARABILITY. A determination that contractor's test results and Government verification test results differ by a statistically significant difference.
 - F. CONFORMITY. Test report indicates that product conforms to the specified requirement when the applicable statistical allowances are applied.
 - G. NONCONFORMITY. Test report indicates that product is significantly different from the specified requirement.

- H. DOUBTFUL (D). A determination, based on noncomparability of test results, that the contractor's test system is questionable and may not be performing its intended function.
- I. RELIABILITY ®. A determination, based on comparability and conformity of test results, that the contractor's test system is performing its intended function.
- J. UNRELIABILITY (U). A determination, based on noncomparability and nonconformity of test results, that the contractor's test results and/or test system are not reliable for any individual item or type of item.

V. RESPONSIBILITIES.

- A. The Chief, Quality Assurance Storage Support/Quality Audit Branch, Quality Assurance Division (DPSC-HQS) is responsible for the Subsistence Test Evaluation Program.
- B. The Product Quality Branch (DPSC-HQP) shall maintain this publication in a current status and review biennially.

VI. PROCEDURES.

- A. The Quality Assurance Storage Support/Quality Audit Branch (DPSC-HQS) shall comply with the following procedures for test reports received from origin and destination inspections:
 - 1. Receive the contractor's test reports and Government laboratory test reports and review them for conformity to contract requirements and compliance with applicable procedures.
 - 2. Perform statistical evaluation of contractor and Government laboratory results for conformity and comparability.
 - 3. When evaluation indicates that the contractor's test results are unreliable, advise the contracting officer, the ACO and direct the Government inspector by telephone to:
 - a. Commence sampling the item on a lot-by-lot basis with next lot presented to the Government.
 - b. Base acceptance of these lots on results of Government verification tests.
 - c. Inform the contractor of these changes in procedures.
 - 4. When evaluation indicates that the contractor's test results are doubtful, advise the contracting officer, the ACO and direct the Government inspector by telephone to:
 - a. Commence sampling the item on a lot-by-lot basis with the next lot offered to the Government.
 - b. Base acceptance on contractor results.
 - 5. Initiate a request to the contracting officer or ACO to notify the contractor in accordance with Exhibit I that his testing system is considered doubtful for specific test, when statistical evaluation indicates noncomparability for those tests for which Government laboratory test results indicate conformity. Letter addressed to DCMAO elements will be coordinated with the Letter addressed to DCMAO elements will be coordinated with the contracting officer, DSCP-HP, who will be furnished a copy. The letter will contain the statement: "This letter has been coordinated with the contracting officer."
 - 6. Initiate a request to the contracting officer or ACO, as applicable, to notify the contractor in accordance with Exhibit II that his testing system is considered unreliable for specific tests, when statistical evaluation indicates noncomparability, and the Government laboratory results from origin samples indicate that the product/products is/are significantly nonconforming to the contract requirements. Letter addressed to DCMAO elements will be coordinated with the contracting officer, DPSC-HP, who will be furnished a copy. The letter will contain the statement: "This letter has been coordinated with the contracting officer."
 - 7. Initiate a request to the contracting officer or ACO to notify the contractor in accordance with Exhibit III that the CoC relating to origin product requirements, is considered unreliable for specific tests when Government verification test results indicate product/products is/are significantly nonconforming. Letter addressed to DCMAO elements will be coordinated with the contracting officer, DPSC-HP, who will be furnished a copy. The letter will contain the statement: "This letter has been coordinated with the contracting officer."
 - 8. Initiate a request to the contracting officer or ACO, as applicable, to notify the contractor in accordance with Exhibit IV that his CoC relating to destination inspection requirements is considered unreliable for specific tests when the results of Government verification testing of samples selected at destination indicate product/products is/are significantly nonconforming.

9. When the initial evaluation, resulting in a test system status or CoC status of other than reliable, is based on test data concerning contracts administered by more than one contracting officer, designate DPSC-HP as the control office.
 10. Reevaluate each block of six lots for testing system and each block of two lots for CoC pertaining to origin product after placing the item/plant on a status of "other than reliable" (until the contracting officer or ACO, as applicable, to notify the contractor of the change in status of his test system/CoC in accordance with applicable subparagraph VI.A.6. or VI.A.7. The number of lots required for reevaluation of the CoC relating to destination inspection shall be as stipulated in the contract under Particular Requirements.
 11. When test results are significantly different from the requirements and the test system was not unreliable at time material was presented to the Government, contact the verification inspector to determine acceptance status of the lot. If the lot has been shipped, process a warranty action report. If the lot has not been shipped, notify the inspector not to accept the lot and to inform the contractor of the nonconformance. Forward packaging, packing, marking, unitization, and labeling (PPMUL) lab reports to the inspector. When PPMUL results are significantly nonconforming, telephonically notify inspector and annotate lab report with the nonconformance and date of notification.
 12. Assist contractor to regain a reliable status by requesting special reports of any circumstance or action which may relate to the problem, and when warranted, by initiating request for collaborative test study.
 13. Promptly furnish to the office administering the contract the costs of Government testing for each evaluation reported for the unreliable period.
 14. Publish the Test Reliability Status Record (DPSC Form 2025) to provide a list of contractor-plant items for which doubtful or unreliable actions are in process. Copies will be forwarded to contracting elements, DCMAOs, Government laboratories, HDSRP-Q and U.S. Department of Agriculture (USDA) Central Administration Control Offices and laboratories involved in testing in addition to appropriate internal elements of DPSC-HQ.
- B. Quality Assurance Specialists, Animal Products Section (DPSC-HOPA)/Non-Animal Products Section (DPSC-HQPN) shall review test reports in the Contractor Quality History Data Files and Item History Data Files for responding to problems concerning:
1. Vendor performance.
 2. Waiver and deviation requests.
 3. Assessment of equitable price adjustments for nonconforming supplies.
- C. Contracting Officers/Administrative Contracting Officers, as applicable, shall:
1. Promptly inform the contractor in accordance with the terms of the contract when his test system, based on the evaluation of test results, is considered doubtful, continued doubtful or unreliable, or has regained a reliable status.
 2. Forward to Directorate of Subsistence, ATTN: DPSC-HQS, a copy of:
 - a. All contractual actions or letters to the contractor pertaining to changes in test systems reliability, as well as forwarding a copy to the inspector.
 - b. Any letter/Memorandum for Record of telephone call from the contractor which challenges the test system status change.
 3. When designated by DPSC as the control office (see subparagraph IV.A.), effect coordination by Defense Switched Network (DSN) to assure that all contracting officers involved act in unison on date of action, costs, and communications to be used. IF an impasse develops during the coordination, the decision of the control office shall prevail. A report of the impasse shall be submitted to the Directorate of Subsistence, ATTN: DPSC-HQS.
 4. Inform the Contract Quality Assurance Office of the DSR or DPSC-HQS, as applicable, of all actions taken which might have an effect on the inspection personnel involved.
- D. Laboratory personnel of the U.S. Army Medical Laboratories; U.S. Army Natick Research, Development and Engineering Center (Natick); Federal Grain Inspection Services Laboratory; USDA Agricultural Marketing Service; Commodity Scientific Support Division Laboratories and Laboratory Branch, Quality Assurance Division, Directorate of Clothing and Textile (DPSC-FOL) shall perform analytical testing of samples submitted and accompanied with a properly prepared DD Form 1222, Request For and Results of Tests.

- E. Chief, U.S. Army Medical Laboratory shall notify the Hazardous Food Recall Officer (DPSC-HQ (M)); DPSC-HQS; contracting officer; ACO, and the Government inspector when test results of samples submitted for analysis reveal the existence of possible health hazards.
- F. The Government inspector shall draw and submit verification samples to the appropriate Government laboratory in accordance with contractual referenced documents and inspection procedures.
- G. Chief, Contract Quality Assurance Office of DSR shall:
 - 1. Aid DPSC contracting officers in processing test reliability actions to assure that Government inspectors and DPSC-HQS receive notice of actions taken by the contracting officer relative to a change in the reliability status of a plant item.
 - 2. Receive Test Reliability Status Record for information purposes.
 - 3. Aid contracting officers in obtaining information from inspectors, when requested, and assure that inspectors report costs pertaining to the inspection caused by implementing an unreliable test system status action.

PART II – ILLUSTRATIONS

The following pages include samples of suggested formats for letters to be used by office administering the contract when notifying contractors of changes to status of the test system.

<u>EXHIBIT NO.</u>	<u>WHEN CONTRACTOR'S TEST SYSTEM IS CHANGED TO:</u>
I	"Doubtful." Based on skip-lot sampling performed by USDA or DCMAE inspection personnel.
II	"Unreliable." DPSC Clause 52.246-E011 is referenced in contract.
	<u>WHEN CONTRACTOR'S CERTIFICATE OF CONFORMANCE IS FOUND TO BE:</u>
III	"Unreliable. Vendor-paid USDA inspection, DPSC Clause 52.246-9P09 and 52.246-9P20 or other clauses for Vendor-paid USDA inspection is in effect.
IV	"Unreliable." Government verification inspection at destination is in effect in accordance with DPSC Particular Requirements contained in the individual Technical Data Sheet (TDS).

SAMPLE
EXHIBIT I

Suggested format for office administering the contract to use when notifying contractors that testing System is considered doubtful for items sampled on a skip-lot basis.

USE APPROPRIATE LETTERHEAD

(Contractor's Name and Address)

Gentlemen:

A comparison of recent test results by a Government laboratory with the test results submitted by your (insert plant location) plant for (insert item nomenclature) discloses that a significant difference exists. Details of this comparison are shown on the enclosed evaluation report.

These differences create doubt as to the degree of reliance that may be placed on your test results. We know that you want to be able to rely upon your test results and that you will want to make a thorough check of your test system and correct any errant procedures or controls that may have developed. To assist you and the Government, a further evaluation of your test system will be conducted. To provide data for this evaluation, the Government inspector assigned to this plant will now be instructed to select samples for testing from each lot produced on DPSC contracts. The test results of these samples and the test results submitted on the plant's samples will be evaluated statistically to determine the reliability of your test system. If the evaluation indicates that your test system is unreliable, this office, regretfully, will have no alternative but to so advise you and require that verification testing be conducted on each lot you produce. In accordance with DPSC Clause 52.246-9P10, Alternative Inspection Requirements for Selected Items, costs incurred by the Government for this sampling and testing will be charged to the contractor, and during the period that your test system is unreliable, the product will be accepted on the basis of verification test results. These charges will begin at the time you receive a written notice of unreliability and will extend until the Government determines that your test system has regained a reliable status.

It is sincerely hoped that you can remove the doubts that presently exist since it is the intent and desire of the Government to be able to rely on your inspection results and thus prevent the need for the cost involved in duplicating inspection services.

Sincerely yours,

Encl

SAMPLE
EXHIBIT II

Suggested format for office administering the contract to use when notifying contractor of unreliable test system when inspection terms for end item reference DPSC Clause 52.246-9P10, Alternative Inspection Requirements for Selected Items.

USE APPROPRIATE LETTERHEAD

(Contractor's Name and Address)

Gentlemen:

Reference is made to contract number (enter contract number and item nomenclature) produced in your plant.

You are hereby advised that the testing system, including the selection of samples, has been found to be unreliable for (item) specified by (specification) and that the item failed to conform to the specification with respect to (characteristic that failed). The enclosed statistical evaluations are the basis for this finding.

In accordance with DPSC Clause 52.246-9P10, Alternative Inspection Requirements for Selected Items, you are hereby advised that, effective upon receipt of this letter, verification testing will be performed by a Government laboratory and your firm will be charged for all costs incurred by the Government in selecting samples and performing these tests, under all DPSC contracts for pertinent product, until the reliability of the test system has been re-established to the satisfaction of the contracting officer. During the time that the test system is considered unreliable (between notification of unreliability and return to reliable status), acceptance of pertinent item will be based on results of tests performed by the Government. The procedures of DPSC Clause 52.2426-9P10 shall apply.

Sincerely yours,

Encl

SAMPLE
EXHIBIT III

Suggested format for office administering the contract to use when notifying contractors of unreliable Certificates of Conformance (CoC) when Vendor-paid USDA inspection is required and DPSC Clause 52.246-9P09, General Inspection Requirements, and DPSC Clause 52.246-9P20, Certificate of Conformance, is part of the contract.

USE APPROPRIATE LETTERHEAD

(Contractor's Name and Address)

Gentlemen:

Reference is made to contract number (enter contract number and item nomenclature) produced in your plant.

You are hereby advised that the Certificate of Conformance (CoC) submitted on this product has been found to unreliable for (component item) specified by (specification). Government verification test results indicate (characteristic(s) that failed and result(s)) whereas the specification requires (specification requirements(s)). Consequently, the contracting officer has determined that the (nonconforming item) did not conform to the specification requirement(s) and that your testing system pertaining to the pertinent CoC is considered unreliable.

In accordance with paragraph (paragraph number of the Master Solicitation or number and date of applicable DPSC Clauses) you are hereby advised that, effective upon receipt of this letter, verification testing will be performed by a Government laboratory and your firm will be charged for all costs incurred by the Government in performing these examinations and tests, under all DPSC contracts for pertinent product, until your reliability has been re-established to the satisfaction of the contracting officer. During the time between notification of unreliability and return to a reliable status, acceptance of the pertinent component and the end item will be based on results of tests performed by the Government on said component.

Sincerely yours,

SAMPLE
EXHIBIT IV

Suggested format for office administering the contract to use when notifying contractors of unreliable Certificate of Conformance (CoC) resulting from destination verification which is specified in the contract terms under Particular Requirements.

USE APPROPRIATE LETTERHEAD

(Contractor's Name and Address)

Gentlemen:

Reference is made to contract number (enter contract number and item nomenclature) produced in your plant and shipped to (enter point of destination inspection).

You are hereby advised that the Certificate of Conformance (CoC) submitted on this product has been found to be unreliable for (component item) specified by (specification). Government verification test results indicate (characteristic(s) that failed and result(s) whereas the specification requires (specification requirement(s)). Consequently, the contracting officer has determined that the (nonconforming item) did not conform to the specification requirements and that your testing system pertaining to the pertinent CoC is considered unreliable.

In accordance with paragraph (paragraph number of the Master Solicitation or number and date of applicable DPSC Clauses) you are hereby advised that, effective upon receipt of this letter, the rate of verification inspection will be increased to each lot received at any destination that receives material from the above mentioned plant. In accordance with the Government Verification Inspection Clause of the above contract, you will be charged for the costs incurred for any or all Government examinations and tests made by the Government until four consecutive Government verification tests are conforming. During the period of test system unreliability, your CoC must be accompanied by a copy of your actual test results for each shipment.

It is sincerely hoped that you can isolate and correct any errant procedure that may have led to the production of nonconforming supplies, since it is the desire of the Government to be able to rely on your CoC and thus prevent the need and cost involved in duplicate inspection by the Government.

Sincerely yours,